FILED UNDER SEAL

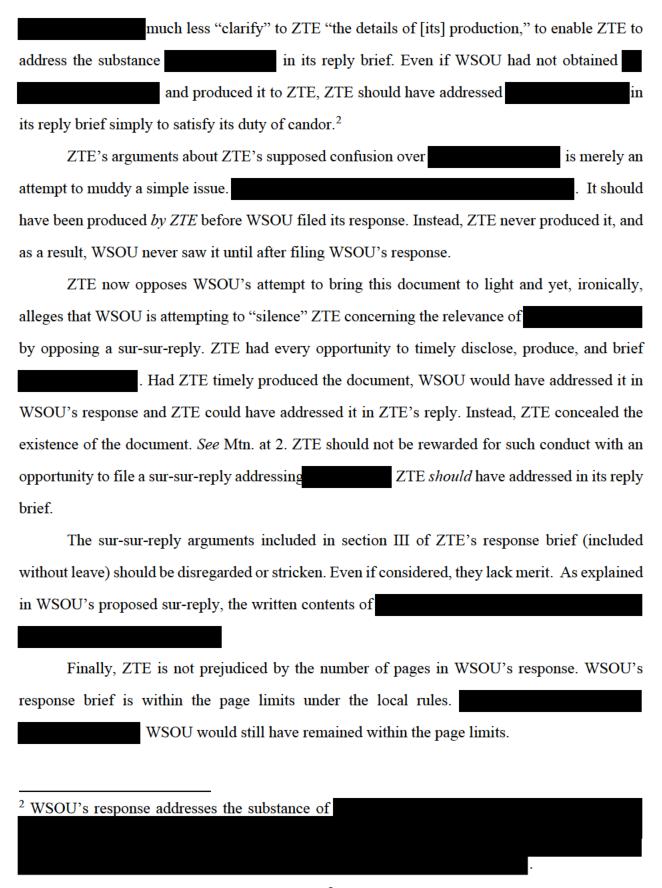
IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

WSOU INVESTMENTS, LLC d/b/a	§	CIVIL ACTION NO. 6:20-cv-487-ADA
BRAZOS LICENSING AND	§	CIVIL ACTION NO. 6:20-cv-488-ADA
DEVELOPMENT,	§	CIVIL ACTION NO. 6:20-cv-489-ADA
,	§	CIVIL ACTION NO. 6:20-cv-490-ADA
Plaintiff,	§	CIVIL ACTION NO. 6:20-cv-491-ADA
	§	CIVIL ACTION NO. 6:20-cv-492-ADA
v.	§	CIVIL ACTION NO. 6:20-cv-493-ADA
	§	CIVIL ACTION NO. 6:20-cv-494-ADA
ZTE CORPORATION, ZTE (USA)	§	CIVIL ACTION NO. 6:20-cv-495-ADA
INC., AND ZTE (TX), INC.	§	CIVIL ACTION NO. 6:20-cv-496-ADA
	§	CIVIL ACTION NO. 6:20-cv-497-ADA
Defendants.	§	
	§	JURY TRIAL DEMANDED
	§	
	§	FILED UNDER SEAL

REPLY SUPPORTING MOTION FOR LEAVE TO FILE SUR-REPLY

There is no merit to Z	TE's argument that WSOU is somehow to blame for the delay in the
addressing	The delay was caused by ZTE's failure to produce it.
There is also no merit	t to ZTE's argument that it will be prejudiced by WSOU's sur-reply
because WSOU allegedly fail	led to (a) timely produce or (b) respond to ZTE's
request for "clarification" abo	out the before ZTE's deadline to file its reply. See
Resp. at 3.	
	. ZTE could not possibly
have been projudiced by WSO	
	OU's alleged failure to timely produce ZTE's own document to ZTE.
Regardless, there is no truth	<u> </u>
	.1
ZTE also could not	have been prejudiced by WSOU's alleged failure to give ZTE
"clarification" about the	before ZTE filed its reply brief. ZTE is a party to
	Although WSOU
did produce it to ZTE before	ZTE's deadline to file a reply, ZTE did not need WSOU to produce

¹ To preserve resources, Exhibit A is being file only in the -487 case.



Therefore, WSOU respectfully requests the Court grant WSOU's Motion for Leave to File Sur-Reply.

Dated: July 14, 2021 Respectfully submitted,

By: /s/Ryan Loveless

James L. Etheridge

Texas Bar No. 24059147

Ryan S. Loveless

Texas Bar No. 24036997 Etheridge Law Group, PLLC

2600 E. Southlake Blvd., Suite 120 / 324

Southlake, TX 76092 Tel.: (817) 470-7249 Fax: (817) 887-5950 Jim@EtheridgeLaw.com Ryan@EtheridgeLaw.com

Mark D. Siegmund State Bar No. 24117055 mark@waltfairpllc.com Law Firm of Walt, Fair PLLC. 1508 North Valley Mills Drive

Waco, Texas 76710

Telephone: (254) 772-6400 Facsimile: (254) 772-6432

Counsel for Plaintiff WSOU Investments, LLC

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically via the U.S. District Court [LIVE]-Document Filing System to all counsel of record July 14, 2021.

/s/ Ryan Loveless
Ryan S. Loveless